

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE:

WHITE STAR PETROLEUM HOLDINGS,
LCC, *et al.*,¹

Debtors.

§ Chapter 11
§ Case No. 19-12521-JDL
§ Jointly Administered

WHITE STAR PETROLEUM, LLC, *et al.*
Plaintiffs.

V.

MUFG Union Bank, N.A., *et al.*
Defendants.

Adv. No. 19-01115

MOTION FOR SUBSTITUTION OF PARTY

NOTICE OF OPPORTUNITY FOR HEARING

Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, OK 73102 no later than 21 days from the date of filing of this request for relief. You should also serve a file-stamped copy of your response or objection to the undersigned movant/movant's attorney [and others who are required to be served] and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice.

¹ The Debtors in these chapter 11 cases, and the last four digits of their U.S. taxpayer identification numbers are: White Star Petroleum Holdings, LLC (0575), White Star Petroleum, LLC (0977), White Star Petroleum II, LLC (4347), White Star Petroleum Operating, LLC (5387) and WSP Finance Corporation (9152) (collectively, the “**Debtors**”). The Debtors’ corporate headquarters is located at 301 N.W. 63rd Street, Suite 600, Oklahoma City, OK 73116.

Nine Energy Service, Inc. (“**Nine**”) hereby files this *Motion for Substitution of Party* (the “**Motion**”) pursuant to Federal Rules of Civil Procedure Rule 25, made applicable by Federal Rules of Bankruptcy Procedure Rule 7025. In support of this Motion, Nine states the following:

1. On October 31, 2019, the Debtors filed the above captioned adversary proceeding (Adv. No. 19-01115) (the “**Adversary Proceeding**”) against SJL Well Service, Inc., among other defendants.
2. On November 7, 2019, subsequent to filing the Adversary Proceeding, Nine, SJL’s parent-company, sold SJL to Brigade Energy Services, LLC (“**Brigade**”). The Asset Purchase Agreement between Nine and Brigade provided that the bankruptcy claims and mineral liens (the “**Transferred Assets**”) held by SJL against the Debtors would be transferred to Nine.
3. On November 8, 2019, the *Notice of Transfer for Nine Energy Service Inc. re: SJL Well Service, LLC* [ECF No. 813], was filed with the Court to evidence the transfer of SJL’s claim against the Debtors to Nine. No objections were filed to the transfer of the claim.
4. On December 11, 2019, Clark Hill Strasburger filed the *Notice of Appearance* [ECF No. 910] on behalf of Nine. On January 6, 2020, Clark Hill Strasburger, on behalf of SJL, filed the *Motion to Withdraw as Counsel to SJL Well Services, LLC* [ECF No. 944].
5. Nine intends to continue to prosecute and defend all actions in the Debtors’ bankruptcy case and Adversary Proceeding related to the Transferred Assets.

WHEREFORE, Nine prays that an order be entered substituting Nine as defendant in place of SJL, for all matters related to the Adversary Proceeding.

DATED: January 14, 2020

Respectfully submitted,

/s/ Robert P. Franke

Robert P. Franke (**TX Bar No. 07371200**)

(admitted pro hac vice)

Audrey L. Hornisher (**TX Bar No. 24094369**)

(admitted pro hac vice)

Clark Hill Strasburger

901 Main Street, Suite 6000

Dallas, Texas 75202

Telephone: (214) 651-2099

Facsimile: (214) 651-4057

robert.franke@clarkhillstrasburger.com

audrey.hornisher@clarkhillstrasburger.com

**COUNSEL FOR NINE ENERGY
SERVICE, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon all parties that are registered or otherwise entitled to receive electronic notices via electronic notification pursuant to the ECF procedures in this District on this 14th day of January 2020.

/s/ Robert P. Franke

Robert P. Franke